

Hearing Date and Time: November 7, 2023 at 2:00 p.m. (Prevailing Eastern Time)
Objection Deadline: October 31, 2023 at 4:00 p.m. (Prevailing Eastern Time)

WHITE & CASE LLP

J. Christopher Shore
Philip Abelson
Colin T. West
Michele J. Meises
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113

– and –

Amanda Parra Criste (admitted *pro hac vice*)
200 South Biscayne Boulevard, Suite 4900
Miami, FL 33131
Telephone: (305) 371-2700
Facsimile: (305) 358-5744

Counsel to Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

Re: Docket No. 460, 838, 839

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' RESERVATION
OF RIGHTS WITH RESPECT TO THE DEBTORS' MOTION TO APPROVE
(I) THE ADEQUACY OF INFORMATION IN THE DISCLOSURE STATEMENT,
(II) SOLICITATION AND VOTING PROCEDURES, (III) FORMS OF BALLOTS,
NOTICES AND NOTICE PROCEDURES IN CONNECTION THEREWITH,
AND (IV) CERTAIN DATES WITH RESPECT THERETO**

¹ The Debtors in these chapter 11 cases along with the last four digits of each Debtor's tax identification number (as applicable) are as follows: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these chapter 11 cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

The Official Committee of Unsecured Creditors (the “**Official Committee**”) appointed in the cases of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) respectfully states as follows in connection with the *Debtors’ Motion to Approve (I) the Adequacy of Information in the Disclosure Statement, (II) Solicitation and Voting Procedures, (III) Forms of Ballots, Notices and Notice Procedures in Connection Therewith, and (IV) Certain Dates with Respect Thereto* [Docket No. 460] (the “**Motion**”):²

1. Since the filing of the Debtors’ amended chapter 11 plan on June 13, 2023 (the “**June Plan**”) [Docket No. 427] and amended Disclosure Statement with respect thereto [Docket No. 429], the Official Committee has worked closely with the Debtors to resolve these chapter 11 cases. To date, the Debtors accepted many of the Official Committee’s comments and suggestions with respect to formulation of a chapter 11 plan. Indeed, the recently-filed further amended chapter 11 plan (the “**Amended Plan**”) [Docket No. 838] and Disclosure Statement with respect thereto (the “**Amended Disclosure Statement**”) [Docket No. 839] are the result of productive discussions among the Debtors, the Official Committee, and the Ad Hoc Group of Genesis Lenders.

2. Those discussions, however, remain ongoing with respect to certain key issues with respect to both the Amended Plan and the Amended Disclosure Statement. At the moment, it would be premature and improvident to publicly air the subject and tenor of those discussions. In the event, though, that such issues cannot be resolved or the discussions with the Debtors cease, the Official Committee reserves its rights to raise issues to this Court with respect to the Amended Plan and Amended Disclosure Statement.

3. The Official Committee reserves the right to further amend, modify, or supplement this Reservation of Rights to raise additional issues with the Motion at the hearing.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed thereto in the Motion.

Dated: October 31, 2023
New York, New York

Respectfully submitted,

By: /s/ J. Christopher Shore

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J. Christopher Shore
Philip Abelson
Colin T. West
Michele J. Meises
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
E-mail: cshore@whitecase.com
philip.abelson@whitecase.com
colin.west@whitecase.com
michele.meises@whitecase.com

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200 South Biscayne Boulevard, Suite 4900
Miami, FL 33131
Telephone: (305) 371-2700
Facsimile: (305) 358-5744
E-mail: aparracriste@whitecase.com

*Counsel to Official Committee of Unsecured
Creditors*